

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

TruePosition Inc.)	
)	
Plaintiff/)	
Counterclaim-Defendant,)	Civil Action No. 05-00747-SLR
)	
v.)	
)	
Andrew Corporation,)	
)	
Defendant/)	
Counterclaim-Plaintiff.)	
)	

PARTIES' PROPOSED DISCOVERY PLANS

Pursuant to the Order For Scheduling Conference dated February 8, 2006, the parties conferred under Fed. R. Civ. P. 26(f) and reached agreement on most, but not all, discovery plan and scheduling matters in this action. The parties therefore submit a proposed scheduling order that has competing proposals on certain items for consideration by the Court in this case. The proposed scheduling order is attached to this paper as Exhibit A, and it identifies the points of disagreement by listing the competing proposals in the following format: [Plaintiff: ---- / Defendant: -----].

There are two principal differences between the parties' proposals. The first is that Andrew seeks to include a supplemental expert discovery period after the Court issues its claim construction and summary judgment rulings. TruePosition, on the other hand, seeks to follow the Court's form scheduling order.

The second principal difference between the parties' proposals is that, to accommodate its proposed supplemental expert discovery, Andrew seeks a trial that begins on October 29, 2007, approximately twenty-four months (24) months after service of the Complaint in this action. TruePosition, on the other hand, seeks a trial that begins on July 9, 2007, approximately twenty (20) months after service of the Complaint.

The parties will be prepared to discuss their positions on the competing proposals during the telephonic scheduling conference on Friday, March 10, 2006, at 8:30 a.m.

Respectfully submitted,

/s/ Scott G. Wilcox

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